

Dear Commissioners,  
On behalf of Wacom Technology, and our parent company Wacom Co. Ltd.  
(Grantee Code HV4), I would like to formally submit comments on ET  
Docket 01-278, specifically on section III.A.6, "Exemption for Very Low-  
Powered Devices". Wacom produces graphics tablets, the devices  
referred to as "pens used to write on specialized computer screens" in  
section 6. Our devices are very low power transmitters using magnetic  
coupling and operating over a distance of less than one half inch. We  
are very much in agreement with the proposal to eliminate the need for  
certification for this class of device. In addition to the cost of  
preparing and filing, certification is usually on our schedules'  
critical path, increasing our time to market.  
Additionally, it would be very beneficial if the range of frequencies  
being considered could be expanded. As computer monitor sizes have  
increased we have found it necessary to increase the operating  
frequency of our devices beyond 490 kHz to avoid magnetic interference  
from monitors' horizontal refresh rates. We would like the commission  
to consider dropping certification requirements for this class of  
device (or alternatively, requiring verification instead of  
certification) in the 490 kHz to 1705 kHz range in addition to the  
below 490 kHz range.  
Thank you for your time.

Best Regards,  
Dave Fleck  
Director of Engineering

-----  
Dave Fleck                      Wacom Technology Corp.              www.wacom.com  
dfleck@wacom.com              360-896-9833x154              ftp.wacom.com  
-----